

## Re: Overview of UAO Deadlines Sarah Flanagan to: Dinkins, Carol

Bcc: Ray Basso, Patricia Hick

06/28/2012 05:59 PM

Carol,

Except for the last date (certification regarding documents) which I *think* should be October 8, 2012, it appears you have accurately set forth the deadlines that would apply if Occidental did not request a conference. As we mentioned on Tuesday, if Occidental were to request a conference, assuming the conference were held on July 9, 2012, the deadlines would be:

Deadline to request conference: July 2, 2012

Conference: July 9, 2012

Effective date of order if not modified by EPA during or after conference: July 12, 2012

Notice of intent to comply (to EPA): July 17, 2012

Initial communication to RM 10.9 Settling Parties: July 17, 2012

Initial good-faith offer: July 26, 2012

Designation of project coordinator (if required): July 26, 2012

Financial assurance due: September 10, 2012

Certification regarding documents due: October 10, 2012

Two other considerations that may affect the schedule are: 1) the order provides that if a conference is timely requested, the effective date is three days following the date the conference is held, unless the effective date is modified by EPA; and 2) we discussed on Tuesday that if Occidental were to request a conference, but the Fourth of July holiday made it impossible to schedule by the meeting by July 9, EPA would take that into account and provide for a reasonable extension of the five day period in which to hold the conference.

Thus, if the conference ends up being scheduled after July 9, or if EPA modifies the effective date as a result of the conference, the rest of the dates would of course change accordingly.

Please let me know if you have any more questions.

-Sarah

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"Dinkins, Carol" Sarah, in our meeting this past Tuesday, we revi... 06/28/2012 03:08:29 PM

From: "Dinkins, Carol" <cdinkins@velaw.com>
To: Sarah Flanagan/R2/USEPA/US@EPA

Date: 06/28/2012 03:08 PM Subject: Overview of UAO Deadlines

Sarah, in our meeting this past Tuesday, we reviewed the UAO deadlines and our understanding of them appeared to have been consistent with your view of them. I'd appreciate confirmation that the dates set forth below reflect EPA's view of the deadlines:

## Overview of UAO deadlines

Deadline to request conference: July 2, 2012

Deadline to hold conference: July 9, 2012

Effective date of order: July 10, 2012

Notice of intent to comply (to EPA): July 16, 2012

Initial communication to RM 10.9 Settling Parties: July 16, 2012

Initial good-faith offer: July 24, 2012

Designation of project coordinator (if required): July 24, 2012

Financial assurance due: September 10, 2012

Certification regarding documents due: October 10, 2012

Please let me know if you have a different understanding or if you have any questions. Thank you, Carol

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